## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF SOUTH CAROLINA

In Re:		) Bankruptcy Case No. 15-02112-dd
Akiem Barber,		) Chapter 13
	Debtor.	)
		)
		)

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned, appearing for PNC Bank, National Association, a creditor of the Debtor and/or a party in interest in the above-captioned case, hereby appears in the above-captioned case under Title 11 of the United States Code (the "Bankruptcy Code") pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure and Section 1109(b) of the Bankruptcy Code, and requests that any and all notices given or required to be given in the above-captioned case and all papers served in this case be given to and served upon the person set forth below at the address and telephone number designated below:

J. Kershaw Spong, Esquire Robinson, McFadden & Moore, P.C. Post Office Box 944 Columbia, SC 29202 Telephone: (803) 779-8900 Facsimile: (803) 771-9411

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only notices and papers referred to in the Rules specified above, but also includes, without limitation, any and all orders, notices, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telecopier, electronic or computer means or otherwise, that affects the Debtor, any property of the Debtor or any property in which the Debtor holds an interest.

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PLEASE TAKE FURTHER NOTICE that neither this Entry of Appearance nor any subsequent appearance, pleading, claim or suit, is intended to waive (i) this party's right to have final orders in noncore matters entered only after *de novo* review by a district judge, (ii) this party's right to trial by jury in any proceedings or trial so triable herein or in any case, controversy, or proceeding relating thereto, (iii) this party's right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which this party is or may be entitled to under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments this party expressly reserves. Further, this Entry of Appearance constitutes a special appearance and is not to be deemed a consent to or waiver of the right to challenge the jurisdiction of the Bankruptcy Court under sovereign immunity or any other basis, which right is expressly reserved.

Robinson, McFadden & Moore, P.C.

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Attorneys for PNC Bank, National Association

Columbia, South Carolina

May \_\_\_\_\_, 2015

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF SOUTH CAROLINA

In Re:		) Bankruptcy Case No. 15-02112-do
Akiem Barber,		) Chapter 13
	Debtor.	CERTIFICATE OF SERVICE
		)

This is to certify that I am a paralegal in the law firm of Robinson, McFadden & Moore, P.C., attorneys for PNC Bank, National Association; that I have this day caused to be served upon the persons named below the **Notice of Appearance and Request for Service of Papers** in the above captioned matter by placing a copy of same in the United States Mail, postage prepaid, in envelopes addressed as follows:

Daniel A. Stone, Esquire Post Office Box 3884 Irmo, SC 29063

Joy S. Goodwin, Esquire Via electronic service (CM/ECF)

Robinson, McFadden & Moore, P.C.

Melissa H. White, Paralegal for J. Kershaw Spong [531] Post Office Box 944 Columbia, SC 29202 (803) 779-8900

Columbia, South Carolina

May \_\_\_\_\_\_\_, 2015